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Before the Arizona Corporation Commission

Arizona Corporation Commission

Susan Bitter Smith - Chairman

Bob Stump - Commissioner

Bob Burns - Commissioner

Tom Forese - Commissioner

Doug Little - Commissioner

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AZ CORP COMMISSION
DOCKET CONTROL

ORIGINAL

In the matter of Epcor Water Arizona, Inc. of)
a hearing on rate consolidation/deconsolidation)
proposals for possible rate changes for utility)
service in all of its Arizona wastewater districts)

Docket Nos SW-01303A-09-0343

W-01303A-09-0343

I am responding to Epcor's request for further clarification on whether to incur further costs in order to provide the information for a full consolidation.

I object to any request by Epcor to incur any further costs in providing the information for a full consolidation without adequate details. Epcor have consistently and persistently ignored my requests to provide or evaluate an on-line, internet accounting system for the benefit of their consumers. As I have pointed out on numerous occasions this should and could have easily been done years ago by both Arizona American Water and Epcor.

On January 5, 2015, five weeks ago I requested the ACC to address this issue. Here is a copy of my request for an additional independent review of Epcor's current accounting system. Now is the time for such a meeting and I again request the ACC to organize it.

Please will the ACC organize a meeting between representatives of the ACC, Epcor, RUCO, myself, any interested intervenor and Epcor's authorised Oracle software representative to discuss and produce the following:

(1) a summary of why the current and past income and expenses for each community in the Agua Fria district cannot be easily and quickly separated, using proportional criteria acceptable to the ACC, such as current value of plant, annual income and expenses, or number of consumers. The purpose of this is to estimate how long the process will take automatically by computer or manually and how much it will cost.

(2) an estimate of how long it will take and how much it will cost for Epcor to modify their current income and expenses system to update it daily with all transactions to keep it permanently up-to-date and also to make public information from the system available to consumers online on the internet.

- (3) an estimate of how long it will take and how much it will cost for Epcor to convert to a new Oracle income and expense system which will be updated daily and make public information from the system available to consumers online on the internet.
- (4) an estimate of how long it will take and how much it will cost for Epcor to make their water and wastewater rates available to consumers online on the internet, providing consumers with options to sequence rates by district, community, outlet type, high rates to low rates and dates.
- (5) confirmation that Epcor income and expense information will be complete, accurate, up-to-date for the full test case for September, 2015.
- (6) confirmation that updating income and expenses daily and keeping all accounts permanently up-to-date is and has been a standard Oracle feature for at least the last ten years.
- (7) confirmation that providing up-to-date income and expense information online on the internet for users has been a standard Oracle feature for at least the last ten years.
- (8) confirmation that an up-to-date income and expenses system will provide the financial information for a full test case at anytime and eliminate the current extensive delays, saving Epcor, the ACC, RUCO and consumers significant expenses.
- (9) confirmation that future Epcor estimates of plant update costs in dollars can be easily be converted to rates in order to make consumers aware of future rate increases.
- (10) confirmation that monthly plant performance can easily be shown to make consumers aware of efficient and inefficient plants.
- (11) confirmation that data will be easily be provided on the internet to show the costs allocated each year to Agua Fria since its formation in terms of its viability as a separate district, as well as costs allocated for the North West Valley Treatment Plant.
- (12) confirmation that data will easily be provided on the internet to show the allocation of wastewater costs between Sun City West and Agua Fria.

Typically, this type of meeting will take 2 - 4 hours. Documenting discussion and responses will take several more hours.

Submitted respectfully on Monday, February 13, 2015



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